

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

**REMARKABLE HEALTHCARE OF
CARROLLTON LP, ET AL.,¹**

DEBTORS.

§
§ **CHAPTER 11**
§
§ **CASE NO. 24-40605**
§
§ **(Joint Administration Requested)**
§
§

**WITNESS AND EXHIBIT LIST OF REMARKABLE HEALTH CARE
FOR HEARING HELD MARCH 22, 2024 AT 9:00 A.M.**

Witness List:

1. Jon E. McPike;
2. Any witness called, listed, or identified by any other party in interest;
3. Any witness necessary for rebuttal or impeachment.

Exhibit List:

EXHIBIT#	DESCRIPTION OF EXHIBIT	OFFERED	OBJECT	ADMITTED
1	Declaration of Jon McPike and Exhibits A – U [Dkt. 4]			
2	Alleon holding \$1,072,045.91 of Debtors' Cash Collections			
3	Notice of Automatic Stay Violation			
4	Regions Bank Screenshots of Automatic Stay Violation			
5	Jan 2024 Email AUSA Tharpe re Anti Assignment			
6	QIPP LOC Detail			
7	Executed (and highlighted) West Wharton Management Agreement for Remarkable			
8	Official State of Texas QIPP website https://www.hhs.texas.gov/providers/medicaid-business-resources/medicaid-chip-directed-payment-programs/quality-incentive-payment-program-nursing-homes/qipp-overview-history			
9	Screenshot from Official State of Texas QIPP website			
10	West Wharton Attorney Trent Krienke says QIPP has been a critical source of funds for the nursing home industry, and "I don't think you can't question the fact that Texas has some of the lowest Medicaid rates in the United States. This is a program to make up for some of that shortfall."			
11	Payroll Register Exhibit C			
12	Payroll Register Exhibit D			

¹ The Debtors have requested the joint administration of the following chapter 11 cases (followed by the last four digits of each Debtor's federal tax identification number): Remarkable Healthcare of Carrollton, LP (5960), Remarkable Healthcare of Dallas, LP (3418), Remarkable Healthcare of Fort Worth (1692), Remarkable Healthcare of Seguin, LP (4566), and Remarkable Healthcare, LLC (5142).

Reservation of Rights

Remarkable Healthcare of Carrollton, LP and its affiliated debtors and debtors-in-possession, (together, the “**Debtors**”) reserve the right to use and/or present demonstratives for any purpose. Debtors also reserve the right to use exhibits, demonstratives, and testimony not listed here for impeachment purposes at the hearing. Debtors reserve the right to supplement or otherwise amend this Witness and Exhibit List prior to the hearing.

Dated: March 22, 2024
Dallas, Texas

GUTNICKI LLP

/s/ Liz Boydston

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